

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

EVAN PROCHNIAK AND  
JAIME PROCHNIAK,

Debtors.

:  
: Case No. 18-12486-mdc  
:  
: Chapter 11  
:  
: **Hearing Date: July 18, 2018, at 11:00 a.m.**  
:  
: **Hearing Location: 900 Market Street**  
: **Courtroom #2**  
: **Philadelphia, PA 19107**  
:

**NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE**

PLEASE TAKE NOTICE THAT secured creditor CRE/ADC Venture 2013-1, LLC, as successor-in-interest to NOVA Savings Bank, has filed the *Motion of Secured Creditor CRE/ADC Venture 2013-1, LLC, for Relief from the Automatic Stay to Execute Upon Judgment and Schedule Sheriff's Sale of Real Property Located in Delaware County* (the "Motion"), so as to execute upon judgment and schedule Sheriff's sale of **7 South Morton Avenue, Morton, PA 19070**.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS AND CAREFULLY DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WITH TO CONSULT AN ATTORNEY).**

1. If you do not want the Court to grant the relief sought in the Motion or if you want the Court to consider your views on the Motion, **then on or before July 5, 2018**, you or your attorney must do ALL of the following:

A. File an answer explaining your position at

**UNITED STATES BANKRUPTCY COURT  
ROBERT N.C. NIX BUILDING  
900 MARKET STREET, SUITE 400  
PHILADELPHIA, PA 19107-4299**

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

B. Mail a copy to the movant's attorney:

**MICHAEL J. BARRIE  
JENNIFER R. HOOVER  
BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP  
222 DELAWARE AVENUE, SUITE 801  
WILMINGTON, DELAWARE 19801**

2. If you or your attorney do not take the steps described in paragraphs 1.A and 1.B above and attend the hearing, the Court may enter an order granting the relief requested in the Motion.

3. A hearing on the Motion is scheduled to be held before the **HONORABLE MAGDELINE D. COLEMAN** on **July 18, 2018, at 11:00 a.m.** in Courtroom #2, United States Bankruptcy Court, Robert Nix Federal Building, 900 Market Street, 2d Floor, Philadelphia, PA 19107.

4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1.B.

5. You may contact the bankruptcy clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP

Dated: June 21, 2018

/s/ Michael J. Barrie

Michael J. Barrie (Pa. I.D. No. 85625)  
Jennifer R. Hoover (Pa. I.D. No. 87910)  
1650 Market Street, 36<sup>th</sup> Floor  
Philadelphia PA 19103  
(267) 207-2947

Counsel for Secured Creditor  
CRE/ADC VENTURE 2013-1, LLC